

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

(1) MARIA DEL ROSARIO CHICO VIETTI,)
Individually and as Parent and Next)
friend of A.R.V., P.F.V. and H.S.V.,)
minor children,)

Plaintiff,)

v.)

(1) WELSH & MCGOUGH, PLLC; an)
Oklahoma Professional Limited Liability)
Corporation;)

(2) CATHERINE WELSH, an individual;)
AND,)

(3) JAIME VOGT, LPC, an individual,)

Defendants.)

Case No.: 21-CV-58-JFH-CDL

**PLAINTIFF'S UNOPPOSED MOTION TO
EXTEND TIME TO RESPOND TO DEFENDANTS'
MOTIONS TO DISMISS [DKT # 20]**

COMES NOW the Plaintiff, by and through her attorneys of record, and asks the Court to extend her time to respond to the motion to dismiss filed by Defendants Welsh & McGough and Catherine Welsh [Dkt. #20]. In support, Plaintiff states the following:

1. The Defendants filed their Motion to Dismiss on March 24, 2021 and Plaintiff's Response is currently due on April 14, 2021. *See* Dkt. #20.

2. Counsel for Plaintiff has numerous obligations in the next two weeks, including depositions, hearings, and a possible trial. As a result, Plaintiff needs additional time to complete her response to Defendants' motion.

3. As such, Plaintiff respectfully requests that the Court extend the deadline to file a Response by fourteen (14) days to April 28, 2021 so that counsel for Plaintiff may adequately address the issues raised by the Defendants' dispositive *Motion*.

4. Counsel for the Defendants has been contacted and has no objection to the requested relief.
5. Additionally, Plaintiff would advise the Court that no conferences or hearings are currently scheduled in this matter and this extension will not affect any scheduling order deadlines.
6. This motion is not made for the purpose of delay but rather to allow Plaintiff to adequately prepare her response to the Defendants' dispositive motion.
7. A proposed order is being submitted herewith for the Court's convenience.

WHEREFORE, Plaintiff prays the Court grant her motion and extend the time to respond to the Defendants' *Motion to Dismiss* [Dkt # 20] until April 28, 2021.

Respectfully submitted,

SMOLEN | LAW, PLLC

/s/ Dustin J. Vanderhoof

Donald E. Smolen, II, OBA #19944

Laura Hamilton, OBA #22619

Dustin Vanderhoof, OBA #21388

611 South Detroit Avenue

Tulsa, Oklahoma 74120

P: (918) 777-4529

F: (918) 890-4529 (Fax)

don@smolen.law

laura@smolen.law

dustin@smolen.law

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of April, 2021, the above and foregoing was submitted to the Clerk of Court using the ECF system for filing and for transmittal of a Notice of Electronic Filing to all counsel who have appeared in this case.

/s/Dustin J. Vanderhoof